

STATE OF SOUTH CAROLINA

(Caption of Case)

Progress Energy Carolinas, Inc.'s Integrated  
Resource Plan (IRP)

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2011 - 8 - E

(Please type or print)

Submitted by: James Blanding Holman IV

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2011-8-E

	)	
	)	
In the Matter of:	)	
	)	MOTION FOR LEAVE TO FILE OUT
Progress Energy Carolinas, Inc.'s	)	OF TIME COMMENTS ON
Integrated Resource Plan (IRP)	)	PROGRESS ENERGY CAROLINAS,
	)	INC.'S IRP
	)	

Pursuant to R.103-829 of the South Carolina Public Service Commission's ("Commission") rules, the South Carolina Coastal Conservation League ("CCL") and Southern Alliance for Clean Energy ("SACE") (collectively, "Petitioners"), through counsel, hereby file this Motion, seeking leave to file comments in the above-captioned proceeding out of time. In support thereof, Petitioners state as follows:

1. On September 1, 2011, Progress Energy Carolinas, Inc. ("Progress") filed its 2011 Integrated Resource Plan. Pursuant to Commission Order No. 2010-124, comments from interested persons were due on or about October 1, 2011.

2. An ex parte briefing on Progress's IRP has been scheduled for December 1, 2011.

3. Petitioners seek to submit comments on Progress's IRP to address their interests and those of their members in a portfolio of supply- and demand-side resources with minimal harmful environmental impacts and costs to ratepayers, as outlined in their Petition to Intervene, which is being filed along with this Motion.

4. Due to multiple resource commitments and the complexity of integrated resource planning, however, Petitioners were unable to complete their review and evaluation of the IRP, and file comments, in the allotted 30-day time frame. Petitioners are currently reviewing the IRP and respectfully request leave to file comments by October 31, 2011, approximately one month prior to the Company's scheduled ex parte briefing before the Commission on December 1, 2011.

5. No parties will be prejudiced by the granting of this motion.

6. Petitioners have spoken with counsel for the Office of Regulatory Staff, and are authorized to represent that ORS does not object to this motion.

WHEREFORE, Petitioners pray that they be granted leave to file comments in this matter by October 31, 2011.

Respectfully submitted this 17<sup>th</sup> day of October, 2011.

s/ J. Blanding Holman, IV  
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*Attorney for SACE and CCL*

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2011-8-E

In the Matter of: )  
)  
)  
) CERTIFICATE OF SERVICE  
Progress Energy Carolinas, )  
Incorporated's Integrated Resource )  
Plan (IRP) )  
)  
)

I certify that the following persons have been served with one (1) copy of Petitioners' Motion for Leave to File Out of Time Comments on Progress Energy Carolinas, Inc.'s IRP via electronic mail and U.S. First Class Mail to the persons named below at the addresses set forth:

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s/ J. Blanding Holman, IV  
J. Blanding Holman IV  
On behalf of Petitioners

This 17th Day of October 2011